



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4**

DATE: September 15, 2003

**SUBJECT: POLREP No. 16
LES Oil Spill Site (FPN N01177)
Louisville, KY**

FROM: Art Smith, OSC
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TO: RRC Region 4 (for distribution)

I. BACKGROUND: (See previous POLREPS 1-15).

II. ACTIONS

From March 19, 2003 - May 2, 2003, the following work activities have been performed at the Site:

1. Tank Demolition: A total of 15 ASTs, 3 underground tanks, and an oil water separator system have been demolished since January 2003. The final AST, tank 10-4 (known as the Day Tank), will require demolition after the remaining emulsified oil/water mix is removed. Starting in February, ASTs were being demolished at a rate of about 1 per week. This production rate was about 50% of what was originally anticipated. The primary factors were the discovery of additional bracing and other internal structural components of the ASTs. Also, several of the ASTs had significant volumes of sludge, which required thickening with kiln dust and handling to a point that it required more time to get the tanks completely apart.
2. Scrap Metal and Used Oil Recycling: 346 tons of steel from the demolition operations were recycled at a scrap metal facility during this period. To date, over 806 tons of steel have been recycled, and all receipts have been forwarded to the Oil Spill Liability Trust Fund (OSLTF). Used oil recycling operations are on hold at the present time. The oil product pumped from the tanks is emulsified with water. Two previously used recycling vendors rejected the material in April. Prior to the change in the characteristics of the accumulated oil product, over 4,300 gallons of oil had been recycled off site at no cost to the project.

3. Oil/Water Treatment: Over 300,000 gallons of an oil/water mixture was processed during this time period for a total of 708,600 gallons processed to date through the onsite treatment system. Treatment operations were suspended in April 2003 when an increased thickness of emulsified material and other debris was detected. This resulted in a decrease of 75% in treatment efficiency; treatment rates were reduced to to less than 5,000 gallons per day as opposed to the normal processing rate of about 20,000 gallons per day. Approximately 25 feet of liquid (or approximately 300,000 gallons) remains in tank 10-4. The water treatment system was decontaminated and demobilized from the site during the weeks of April 21 through May 2, 2003.
4. Soil/Sludge Stockpiles: Impacted soils derived from pipe removal operations and sludge from tank floors were consolidated into one bermed area formerly occupied by tank 20-1 at the North end of the site. There are six distinct stockpiles, four of which are soil/sludge mixtures and two are of tank 10-2 derived sludge exclusively. Stockpile measurements yield approximately 2,000 cubic yards of material.
5. Demobilization: All personnel (EPA, ERRS and START) and equipment were demobilized from the site on May 2, 2003.

III. FUTURE ACTIONS

An additional two months of on-site work is required to complete this phase of this oil removal action. Mobilization to the site is scheduled for October 2003, in order to avoid further delays due to winter weather conditions. Changes in the composition of oil water mixtures have adversely impacted costs and schedule on this project. The offsite disposal of this material, in addition to oil-bearing sludges and soils, is estimated to cost about \$250,000, which is almost 2 times what was originally anticipated. Evidence of oil product in the subsurface was detected after the tanks were demolished. A subsurface hydrogeological investigation is required to identify whether oil accumulated in areas below ground represent a threat of a discharge to the Ohio River. This work is estimated to cost about \$60,000. Unless this investigation discloses that additional mitigative actions are needed to prevent an oil discharge, the OSC anticipates the target date for completion of the demolition and treatment phase to be December 15, 2003. Total contractor personnel and equipment costs are estimated to be about \$350,000 during this period. The work plan for activities during the remaining period is as follows:

- finish tank demolition and oil/water treatment
- recycling of scrap metal and used oil
- disposal of wastestreams accumulated during the removal action (e.g., oil/water emulsions, personal protective equipment and other solid waste, etc.)
- demobilization of personnel and equipment from the site

The OSC is requesting immediate assistance from NPFC to increase the total FPN ceiling by \$500,000 in order to mitigate the substantial threat of an oil discharge at this Site.

IV. COST INFORMATION

	Costs-to-Date	Existing Project Ceiling	New Project Ceiling
Extramural			
ERRS			
IT Corp	(\$ 727,190)	\$ 754,000	\$ 855,000
CMC	<u>(\$ 1,194,568)</u>	<u>\$ 1,369,000</u>	<u>\$1,644,568</u>
	(\$ 1,921,758)	\$ 2,123,000	\$2,499,568
START	(\$ 113,140)	\$ 127,000	\$ 150,000
USCG Strike Team	(\$ 41,950)	\$ 45,000	\$ 45,000
REAC	-0-	-0-	\$ 60,000
Intramural			
EPA Direct Reimbursable			
	<u>(\$ 38,833)</u>	<u>\$ 55,000</u>	<u>\$ 63,832</u>
	(\$ 2,115,681)	\$ 2,350,000	\$2,818,400
Contingency	-0-	<u>+\$ 150,000</u>	<u>+\$ 181,600</u>
Total	(\$ 2,115,681)	\$ 2,500,000	\$3,000,000